



## Seo Law Group, PLLC

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June 8, 2022

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### **VIA ECF**

Hon. Judge John G. Koeltl  
United States District Court  
Southern District of New York  
40 Foley Square  
New York, NY 10007

**Re: Parvez v. Artistic Pizza Inc. et al.**

Case No. 1:22-cv-03896

Dear Hon. Koeltl:

This office represents Defendants in the above referenced matter. I write to respectfully request this court intervene to admonish Plaintiff Monir Parvez for his reprehensible conduct and further to order Plaintiff not to have any future contact with any of the defendants or their restaurant. I make such request based on the information relayed by Defendant Sayfulla Saber as follows:

On or about May 31, 2022, Plaintiff had a verbal altercation with one of the pizza restaurant's workers. On that day, Plaintiff called Defendant Sayfulla Saber and told him that, "I'm not working here anymore because if I get mad, I will hit him *[the worker who Plaintiff had a verbal altercation with]*." Thereafter, Plaintiff stopped coming to work at the restaurant.

However, on June 6, 2022, Plaintiff showed up at the restaurant at night after 7:00 pm. Defendants were not present at the restaurant at that time. Plaintiff walked inside the restaurant all the way to the Mr. Saber's office and sat in front of Mr. Saber's desk and was digging through his belongings. Two employees walked by Mr. Saber's office where Plaintiff was sitting but were not able to say anything to Plaintiff because Plaintiff had previously made verbal threats to the employees by stating, "ok, come outside, I will show you who I am" whenever someone made



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unfavorable comments to him. As soon as Plaintiff left, one of the restaurant's workers telephoned Mr. Saber, and Mr. Saber realized that his cash was missing<sup>1</sup>.

On June 7, 2022, Mr. Saber reported Plaintiff to the police after checking his security camera equipped inside his office. Around midnight on that day, Plaintiff called Mr. Saber, but Mr. Saber did not respond to Plaintiff's phone call out of fear. Then after midnight, Plaintiff texted Mr. Saber and indicated that, "you called the cops ... ."

Clearly, this communication constitutes a threat, and was intended to alarm Mr. Saber, his family members, and workers, and threaten their safety, or potentially take advantage of his lawsuit that he is participating in as a plaintiff in this action. During Mr. Saber's call to my office, he was extremely concerned about his safety and the daily cash income the restaurant keeps in the cash register. Mr. Saber was extremely anxious after receiving Plaintiff's text message and questioned whether plaintiff is permitted to orchestrate or follow-up on the implied threat. Counsel assured Mr. Saber that she would seek the Court's intervention.

On June 8, 2022, Defendants' counsel noticed Plaintiff's counsel that she would be seeking the intervention of the Court as the conduct of Plaintiff is reprehensible and egregious. Accordingly, it is respectfully requested this Court intervene to admonish Plaintiff for his reprehensible conduct and further to order Plaintiff not to have any further contact with any of the defendants in this case and their restaurant wither directly, or indirectly.

We thank the Court for its time and attention to this matter.

Respectfully Submitted,

Seo Law Group, PLLC

By: /s/ Diana Seo  
Diana Y. Seo, Esq.  
*Attorneys for Defendants*

cc: All counsel of record (via ECF)

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<sup>1</sup> Defendants' Counsel was informed that Plaintiff worked at the restaurant after he initiated this lawsuit, and took the cash from the cash register as needed for his portion of (unpaid) tips and/or compensations. As Defendants were aware that Plaintiff filed this wage and hour lawsuit, and out of fear that Plaintiff potentially add any *false* accusatory claims against Defendants, they had no choice, but to wait until Plaintiff terminated his employment at the restaurant.